UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION VII
726 MINNESOTA AVENUE
KANSAS CITY, KANSAS 66101

October 31, 1997

GENERAL NOTICE LETTER
URGENT LEGAL MATTER--PROMPT REPLY NECESSARY
CERTIFIED MAIL--RETURN RECEIPT REQUESTED

Ohio Edison
4757 South Main Street
Akron, OH 44319

Re: PCB Treatment, Inc. Superfund Site
Kansas City, Kansas and Kansas City, Missouri

Dear Reader:

This letter notifies you of potential liability, as defined by Section 107(a) of the Comprehensive Environmental Response, Compensation, and Liability Act, 42 U.S.C. Section 9607(a), as amended (CERCLA), that you may incur or may have incurred with respect to the above-referenced site. This letter also notifies you of potential response activities at the site, which you may be asked to perform or finance at a later date.

BACKGROUND INFORMATION

The PCB Treatment, Inc. Superfund site (the "site") consists of two buildings and the surrounding areas which were operated by waste disposal companies during the 1980s. These companies received waste shipments of polychlorinated biphenyls (PCBs). PCBs are chemicals which were formerly used in electrical equipment to prevent overheating. The companies operated at two locations. One building is located in Kansas City, Missouri, and the other building is located in Kansas City, Kansas. The facilities obtained a permit pursuant to the Toxic Substances Control Act (TSCA) to process and dispose of waste PCBs; however, due to regulatory violations and releases of PCBs at the facilities, the permit was not renewed and the facilities ceased operations in 1986. Efforts to complete closure and clean-up of the facilities under TSCA proved unsuccessful due to financial and technical reasons, and the facilities were abandoned. Because of the extensive residual PCB contamination, the facilities were referred to the Superfund program to be addressed using CERCLA authorities.

Over 1,500 parties sent materials containing PCBs to the site. These materials included transformers, capacitors, PCB oil, regulators, debris and other miscellaneous equipment. Due to the large number of parties, the U.S. Environmental Protection Agency (EPA) anticipates that a number of parties may qualify for "*de minimis*" settlements. The EPA's projected timetable for offering these settlements, along with other information regarding liability, is discussed below.

Is your RETURN ADDRESS completed on the reverse side?

SENDER:

- Complete items 1 and/or 2 for additional services. PCB-SD MEYERS
- Complete items 3, 4a, and 4b.
- Print your name and address on the reverse of this form so that we can return this card to you.
- Attach this form to the front of the mailpiece, or on the back if space does not permit.
- Write *"Return Receipt Requested"* on the mailpiece below the article number.
- The Return Receipt will show to whom the article was delivered and the date delivered.

I also wish to receive the following services (for an extra fee):

1. ☐ Addressee's Address
2. ☐ Restricted Delivery

Consult postmaster for fee.

3. Article Addressed to:

Ohio Edison
4757 South Main Street
Akron, OH 44319

4a. Article Number
P446 646 031

4b. Service Type

- ☐ Registered
- ● Certified
- ☐ Express Mail
- ☐ Insured
- ● Return Receipt for Merchandise
- ☐ COD

7. Date of Delivery
11-4-97

5. Received By: *(Print Name)*

8. Addressee's Address *(Only if requested and fee is paid)*

6. Signature: *(Addressee or Agent)*
X

PS Form **3811**, December 1994

Domestic Return Receipt

Thank you for using Return Receipt Service.

NOTICE OF POTENTIAL LIABILITY

The EPA has documented the release or threatened release of hazardous substances, pollutants, or contaminants at the above-referenced site. The EPA has spent, or is considering spending, public funds on actions to investigate and control such releases or threatened releases at the site. Unless EPA reaches an agreement under which a potentially liable party or parties will properly perform or finance such actions, EPA may perform these actions pursuant to Section 104 of CERCLA.

Under Sections 106(a) and 107(a) of CERCLA, 42 U.S.C. Sections 9606(a) and 9607(a), potentially liable parties may be ordered to perform response actions deemed necessary by EPA to protect the public health, welfare or the environment, and may be liable for all costs incurred by the government in responding to any release or threatened release at the site. Such actions and costs may include, but are not limited to, expenditures for conducting an Engineering Evaluation/Cost Analysis (EE/CA), conducting a removal action, and other investigation, planning, response, oversight, and enforcement activities. In addition, potentially liable parties may be required to pay for damages for injury to, destruction of, or loss of natural resources, including the cost of assessing such damages.

The EPA has evaluated information in connection with the investigation of the site. Based on this information, EPA believes that you are a potentially responsible party (PRP) with respect to this site. Potentially responsible parties under CERCLA include current and former owners and operators of the site as well as persons who arranged for disposal or treatment of hazardous substances sent to the site, or persons who accepted hazardous substances for transport to the site. By this letter, EPA notifies you of your potential liability with regard to this matter for the costs associated with investigation and cleanup of this site.

In accordance with CERCLA and other authorities, EPA has already undertaken certain actions and incurred certain costs in response to conditions at the site. These response actions include preliminary investigation of the site by EPA, the performance of an EE/CA by a group of PRPs, EPA oversight costs associated with the EE/CA and the costs associated with identifying and locating PRPs, as well as information management associated with PRP information. The EPA may expend additional funds for response activities at the site under the authority of CERCLA and other laws.

SITE RESPONSE ACTIVITIES

The EPA has performed some investigation activities at the site. At present, a group of PRPs is performing an EE/CA under an Administrative Order on Consent with EPA. The purpose of the EE/CA is to evaluate and compare different cleanup alternatives. In addition to the EE/CA, EPA is planning to conduct the following activities at the site:

1. Removal activities at both the Kansas and Missouri facilities, which may include a range of possibilities from cleaning up the contamination inside the buildings and in the

soil surrounding the buildings to demolition of the buildings. Demolition may be necessary if it is determined that the cleanup process would not adequately address the residual risks, or if removal of the contaminated areas within the buildings would render the buildings unstable or uninhabitable. After the EE/CA is completed, EPA will make a decision as to which cleanup alternative is preferred by EPA, and hold a formal public comment period so that all interested parties can provide input to EPA before a final decision is made.

2. Follow-through activities to monitor, operate, and maintain the completed removal action as required at the site after the removal action is complete.

REQUEST FOR INFORMATION

The EPA is working under the Superfund program to investigate and clean up contamination from hazardous substances, particularly polychlorinated biphenyls (PCBs), from the former PCB Treatment, Inc. facilities at 2100 Wyandotte Street, Kansas City, Missouri and 45 Ewing Street, Kansas City, Kansas (the "Sites"). Superfund is a federal program designed to clean up hazardous substances that may pose a threat to human health or the environment. (The full name of the Superfund program is the Comprehensive Environmental Response, Compensation and Liability Act of 1980, as amended by the Superfund Amendments and Reauthorization Act of 1986, which together are referred to as CERCLA.) PCB Treatment, Inc. operated from 1982 until approximately 1987. During that time, the following names were used: PCB Treatment, Inc.; PCB, Inc. of Missouri; PCB, Inc. of Kansas; Environmental Resource Management, Inc.; and Envirosure (which according to business records acted as the sales and invoicing agent). PCB contamination has been detected in the buildings and soils at both Sites and EPA is investigating the nature and extent of this contamination.

As part of this investigation, the EPA is sending information request letters to the owners of the Sites, and to all persons who may have sent materials containing PCBs to the Sites. Business records obtained from S. D. Myers in response to its information request letter indicates that your firm used S. D. Myers to send materials to the facility(ies) for treatment and/or disposal. Pursuant to the authority of Section 104(e) of CERCLA, 42 U.S.C. § 9604(e), you are hereby requested to respond to the Information Request enclosed with this letter.

You may assert a business confidentiality claim covering part or all of the information you submit. The manner in which to assert such a claim is set forth in 40 C.F.R. § 2.203(b). The information covered by such a claim will be released by EPA only to the extent and in accordance with the procedures set forth in 40 C.F.R. Part 2, Subpart B. If no such claim accompanies the information when it is received by EPA, it may be made available to the public without further notice to you. You should read these regulations carefully, together with the standards set forth in Section 104(e)(7) of CERCLA, 42 U.S.C. § 9604(e)(7), before asserting a business confidentiality claim, because certain categories of information are not entitled to confidential treatment.

Your response to this Information Request should be mailed within 30 days of receipt of this letter to:

Pauletta France-Isetts
Superfund Division
U.S. EPA, Region VII
726 Minnesota Avenue
Kansas City, Kansas 66101

The EPA strongly encourages you to give this matter your immediate attention and to respond to the Information Request within the time specified above. Please be advised that the EPA has the authority to compel compliance with this Information Request and to seek penalties in the event of non-compliance, as set forth in Section 104(e)(5) of CERCLA, 42 U.S.C. § 9604(e)(5).

The EPA plans to review all the information submitted by you and other persons who sent materials to the Sites for the purpose of achieving clean-up of the contamination and settlement of all the parties' potential liability for the contamination as expeditiously as possible.

This Information Request is not subject to the approval requirements of the Paperwork Reduction Act of 1980, 44 U.S.C. § 3501, et seq.

INFORMATION TO ASSIST RESPONSIBLE PARTIES

To assist PRPs in their understanding of the issues associated with this site, EPA is providing the following information as an enclosure to this letter:

1. A list of names and addresses of PRPs to whom this notification is being sent. This list represents EPA's preliminary findings on the identities of PRPs. Inclusion on, or exclusion from, the list does not constitute a final determination by EPA concerning the liability of any party for the release or threat of release of hazardous substances at the site.

2. A summary of the volume and nature of substances contributed by you. This summary is based upon information obtained from facility records and from your response to a CERCLA information request letter which was previously sent to you. **Please examine the information contained in this summary carefully, as your ranking with respect to the total waste contributed to the site will be based on this information.** If you believe that there is an error in the enclosed information regarding the volume of materials you sent to the site, please provide EPA's representative listed below with documentation which demonstrates why you believe there is an error. This documentation must be sent to EPA within thirty (30) days of your receipt of this notice letter. Please send any documentation to Pauletta France-Isetts at the above-listed address.

3. A background information sheet about the site which explains the history of the site, the nature of the contamination at the site, why the site is being addressed under Superfund and a discussion of past and current response actions at the site.

PRP STEERING COMMITTEE

Some of the PRPs at the site have formed a Steering Committee. The Steering Committee has agreed to perform the EE/CA pursuant to an Administrative Order on Consent with EPA. The Steering Committee has indicated that it will enter into negotiations with EPA for the performance of the necessary removal actions at the site. If you would like to be included as a party to these negotiations, EPA recommends that you contact the Steering Committee representative listed below:

Russell Selman, Esq.
Katten, Muchin & Zavis
525 West Monroe Street, Suite 1600
Chicago, IL 60661-3693
(312) 902-5390

Alternatively, EPA encourages each PRP to select one person from its company or organization who will represent its interests.

Please note that many parties will qualify as *de minimis* parties pursuant to Section 122(g) of CERCLA, 42 U.S.C. § 9622(g). Under this provision of CERCLA and the policies EPA has developed under this provision, certain parties who contributed a relatively small portion of the waste to a site may resolve their liability for site costs by paying a cash settlement. The EPA anticipates offering such settlements to many of the parties at this site. Before offering such settlements, EPA would like to ensure that volumetric and cost information is accurate. Cost information will not be available until EPA selects a response action at the conclusion of the EE/CA process. Therefore, EPA will notify all parties at a later date of: 1) the allocation formula to be used to calculate the appropriate cost share; and 2) the names of the parties who will be offered *de minimis* settlements.

ADMINISTRATIVE RECORD

Pursuant to CERCLA Section 113(k), EPA must establish an administrative record that contains documents that form the basis of EPA's decision on the selection of a response action for a site. The administrative record files, which contain the documents related to the response action selected for this site, will be available to the public for inspection and comment. The primary location is generally the EPA Regional office. Because the site is located within the Kansas City area, this will be the only location at which the public may view the administrative record. The administrative record will be completed after conclusion of the EE/CA.

PRP RESPONSE AND EPA CONTACT

It is not necessary to contact EPA in response to this letter unless you have questions concerning the information contained in this letter. The EPA will send notification at a later date regarding parties eligible for *de minimis* settlements. In addition, an information update will be sent to all parties upon completion of the EE/CA. This update will also contain information regarding initiation of negotiations for performance of removal activities. Again, if you are interested in joining the Steering Committee, please contact Russell Selman at the address listed above.

If you have any questions, please call (913) 551-7018 and leave a message. Because of the large number of parties involved at this site, EPA has set up a voice message system at this number that is specifically dedicated to callers who need information on this site. Please leave a message at this number and an EPA employee will return your call as soon as possible.

Sincerely,

Michael J. Sanderson
Director, Superfund Division

Enclosures

cc: Randy Carlson, KDHE
Candice Hamil, MDNR
Russell Selman, Katten Muchin & Zavis

THE ATTACHED INFORMATION IS AN EXCERPT FROM THE

S.D. MEYERS

104(e) RESPONSE

FOR:

Ohio Edison

SDMEYERS CUSTOMER

Summary of PPM, KS Loads

LOAD 1 — 5/13/86 DATE SHIPPED — MANIFEST: 86-0206-0

Customer	Volume	AVERAGE ppm PCBs	lb. PCBs
A. Vista Chem.	935	2704	18.529
B. Eastern Rock	385	508	1.435
C. Chrysler	935	586	4.016
D. A.E.Staley	1155	103	0.868
E. Owens-Illinois	330	194	0.470
F. Merryweather	165	406	0.491
G. Chrysler	55	761	0.307
H. Reedy Creek	165	2216	2.680
I. Eldred Div.	110	191	0.154
J. Community Mu	495	60	0.218
K. Faultless Rub	165	628	0.760
L. Great Lakes C	220	50	0.081
M. CEI	165	56	0.068
	5280	*777*	*30.075*

A. Vista Chemical Westlake, LA #954000 — no job folder

			ppm	nameplate gal
TCs:	18	1424@1242	1424	191
	9	3009@1260	3009	800

B. Eastern Rock Products Jordanville, NY #47840 — OK

			ppm	nameplate gal
TCs:	1	133@1242 384@1260	517	65
	2	88@1242 228@1260	316	65
	3	89@1242 265@1260	354	65
	4	1309@1260	1309	59
	5	202@1260	202	59
	6	304@1260	304	35

C. Chrysler, Kokomo, IN #836000 — no job folder

TC	9002	586@1242	586	825

D. A.E.Staley, Morrisville, PA #33600 — OK

			ppm	nameplate gal
TCs:	14	46@1242	46	281
	20	122@1260	122	817

Summary of PPM, KS Loads

E. Owens-Illinois (now Techniglas), Pittston, PA #2980000 — OK

			ppm	nameplate gal
TCs:	4	161@1242	161	110
	5	143@1260	143	110
	3(7001)	279@1260	279	110

F. Merryweather Foam, Barberton, OH #45790 — OK

			ppm	nameplate gal
TCs:	1	111@1242 260@1260	381	40
	2	123@1242 384@1260	507	60
	3	21@1242 257@1260	279	40

G. Chrysler, Warren, MI #45250 — no job folder

No info or folder; 761 ppm unit was highest we ever serviced here.

H. Reedy Creek Utilities, Lake Buena Vista, FL #4104000 — no job folder

			ppm	nameplate gal
TCs:	1		1113	1324
	3		3796	536
	4		3488	140
	6	no prior	3796	120
	7		734	120
	8	no prior	3796	120
	9	no prior	3796	120
	13		2633	275
	14		1270	275
	15	no prior	3796	120

All are Aroclor 1242. All units that were missing prior PCB results had much lower proof results than did TC3, so it is conservative to consider these to be the same result - 3796 ppm

I. Eldred Division of Ethan Allen, Eldred, PA #1539200 — OK

TC	2	191@1254	191	95

J. Community Mutual Insurance Co, Worthington, OH #48100 — OK

This was a disposal job; results in job folder.

K. Faultless Rubber, Ashland, OH Disposal Job — OK

Results in job folder.

			ppm	nameplate gal
TCs:	15		824	45
	16		279	45
	17		781	45

Summary of PPM, KS Loads

L. Great Lakes Carbon (now SGL), Morganton, NC OK
This is <50 ppm flush fluid from a field service job.

LOAD 2 6/20/86 DATE SHIPPED MANIFEST: 86-213-0

Customer	Volume	AVERAGE ppm PCBs	lb. PCBs
A. Northern Pet	4000	202	5.920
B. SDMI	1000	500	3.665
	5000	*262*	*9.585*

A. Northern Petrochemical (now Quantum Chem/USI), Morris, IL OK
#2855200

		ppm	nameplate gal
TCs:	45	29	284
	37	18	284
	40	14	685
	41	27	284
	38	29	284
	42	261	685
	44	46	284
	43	558	958
	34	49	284
	33	325	284

This is a retro job after PCB-Gone. These are the results of the oil removed and replaced, per the job folder.

SDMI load was MR liquids. <500 ppm.

LOAD 3 8/7/86 DATE SHIPPED MANIFEST: 86-223-0DX

Customer	Volume	AVERAGE ppm PCBs	lb. PCBs
A. ADM	3252	897	21.372
B. Cinn.Milacron	200	203	0.298
C. NJ Zinc	550	122	0.493
D. Eastalco	385	651	1.836
E. SDMI	770	500	2.822
	5157	*710*	*26.821*

Summary of PPM, KS Loads

A. ADM Corn Sweetener, Decatur, IL #34680 — OK

			ppm	nameplate gal
TCs:	5	155@1242	155	800
	6	1103@1242	1103	800
	12	218@1242	218	800
	15	1984@1242	1984	800
	24	1023@1242	1023	800

B. Cincinnatti Milacron, Cincinnatti, OH #850000
One unit (TC35), 198@1242, 5@1260, 203 ppm, 200 gallons.

C. New Jersey Zinc, Odensburg, NJ #2801100 — OK
Results in job folder.

			ppm	nameplate gal
TCs:	20		188	70
	21		172	70
	19		157	70
	14		92	346

D. Eastalco, Frederick, MO #3760 — OK

			ppm	nameplate gal
TCs:	29	66@1242 132@1260	198	314
	6	71@1242 52@1260	1103	314

SDMI load was MR liquids. <500 ppm.

LOAD 4 — 9/3/86 DATE SHIPPED — MANIFEST: 3784

Customer	Volume	AVERAGE ppm PCBs	lb. PCBs
A. ADM	3314	2464	59.855
B. Grand Haven	360	465	1.226
C. Olin	385	19	0.054
D. USPO/CRTH	140	249	0.256
E. Arch. Illinois	695	129	0.655
F. SDMI	165	500	0.605
	5059	*1689*	*62.649*

A. ADM Corn Sweetener, Decatur, IL #34680 — no folder
This is result listed in disposal records.

Summary of PPM, KS Loads

B. City of Grand Haven, Grand Haven, MI #40180 — OK

	ppm	nameplate gal
Energized retrofill.	244	100
	912	100
	238	100

C. Olin Corp. (now Primex), St. Marks, FL #2904000
Per job folder, TC7 and TC10 were retro'd, energized. Both at 19 ppm.

D. US Post Office and Courthouse, Lexington, KY #50040 — OK

			ppm	nameplate gal
TCs:	2	135@1260	135	140
	second unit	max	363	140

E. Architect of the State of Illinois, Percy, IL #25460 — OK

		ppm	nameplate gal
TCs:	9007	163	365
	9004	110	170
	9005	73	170

SDMI load was MR liquids. <500 ppm.

LOAD 5 — 9/23/86 DATE SHIPPED — MANIFEST: 86-0230

Customer	Volume	AVERAGE ppm PCBs	lb. PCBs
A. Amoco	660	90	0.437
B. Exxon	726	117	0.621
C. Jasper Co.	2910	288	6.148
D. Liqui-Box	395	838	2.426
F. SDMI	509	500	1.865
	5200	*302*	*11.497*

A. Amoco, Joliet, IL #246000 — OK
Retro of PCB-Gone, results from job folder.

		ppm	nameplate gal
TCs:	36	89	255
	11	15	203
		167	203

B. Exxon, Linden, NJ #57810 — OK
Results from job folder.

	ppm	nameplate gal
TCs:	154	242
	112	242
	84	242

Summary of PPM, KS Loads

C. Jasper County, Rensalear, IN #1340

			ppm	OK nameplate gal
TCs:	5	386@1242	386	603
	6	388@1242	388	603
	7	290@1242	290	603
	8	287@1242	287	603
	12	141@1242	141	81
	13	130@1242	130	81
	14	144@1242	144	81
	20	103@1242	103	81
	22	111@1242	111	81
	23	116@1242	116	81
	24	122@1242	122	81
	30	68@1260	68	52
	33	106@1242	106	81

SDMI load was MR liquids. <500 ppm.

LOAD 6 — 9/26/86 DATE SHIPPED — MANIFEST: 86-0231

Customer	Volume	AVERAGE ppm PCBs	lb. PCBs
A. Pennzoil	3100	921	20.919
B. Moon Lake	825	61	0.369
C. Ohio Edison	220	500	0.806
	4145	*727*	*22.095*

A. Pennzoil, Rouseville, PA #3067100

			ppm	OK nameplate gal
TCs:	8	53@1260	53	80
	10	4@1242 47@1260	51	75
	11	3@1242 53@1260	56	75
	16	10@1242 70@1260	80	157
	17	29@1260	29	157
	18	6@1242 67@1260	73	157
	20	3@1242 35@1260	38	35
	21	3@1242 27@1260	30	35
	24	42@1260	42	80

Summary of PPM, KS Loads

31	75@1260	75	90
36	3059@1242	3059	871
37	101@1242	123	70
	22@1260		
38	85@1242	106	70
	21@1260		
39	84@1242	106	70
	22@1260		
44	102@1260	102	75
46	169@1260	169	75
47	5@1242	62	157
	57@1260		
48	4@1242	80	157
	76@1260		
49	88@1260	88	157
50	62@1260	62	153
51	62@1260	62	153
55	60@1260	60	110
56	105@1242	105	569
57	1724@1242	1724	569

B. Moon Lake, Roosevelt, UT #9890 OK
This was a final retro of a PCB Gone job for TC 33, 62, 57. The oil was split between two manifested loads, and the actual average concentration for oil from the whole job was 61 ppm.

C. This was an MR disposal job, actual concentrations not available from information that we reviewed. It was a maximum, however, of <500 ppm, so we use 500 in the summary.

LOAD 7 9/24/86 DATE SHIPPED MANIFEST: PG-0488-9

Customer	Volume	AVERAGE ppm PCBs	lb. PCBs
A. Moon Lake	2609	61	1.167
B. Lone Star	200	830	1.217
	2809	*116*	*2.383*

No Masters for this load.
A. Moon Lake, Roosevelt, UT #9890 OK
This was a final retro of a PCB Gone job for TC 33, 62, 57. The oil was split between two manifested loads, and the actual average concentration for oil from the whole job was 61 ppm.

B. Lone Star Industries
Could not sufficiently identify this job to find it. The ppm listed for the load should be the highest from the included jobs, which would make the Lone Star concentration 830 ppm.

Summary of PPM, KS Loads

LOAD 8	10/13/86 DATE SHIPPED		MANIFEST: 86-0233
		AVERAGE	
Customer	Volume	ppm PCBs	lb. PCBs
A. Murphy Oil	667	2146	10.492
B. N. Carolina U	285	131	0.274
C. Vista Chem	1200	358	3.153
	2152	*882*	*13.919*

This load was sent as part of a shipment by PPM to Pyrochem for destruction.

A. Murphy Oil Corp., Meraux, LA #2708000

			ppm	OK nameplate gal
TCs:	13	2146@1254	2146	445

This was a second trip retrofill.

B. North Carolina University, Wilmington, NC #27860

			ppm	OK nameplate gal
TCs:	7	159@1242	159	160
	23	42@1242 21@1254	63	50
	24	58@1242 53@1254	111	50

C. Vista Chemical, Westlake, LA #954000

			ppm	OK nameplate gal
TCs:	9	104@1254	104	800
	18	1424@1242	1424	191

Second trip retrofill, reason for additional flush.

LOAD 9	12/19/86 DATE SHIPPED		MANIFEST: 86-247
		AVERAGE	
Customer	Volume	ppm PCBs	lb. PCBs
A. Champlin	440	920	2.967
B. Kimberly Clark	1628	639	7.623
C. Muni. Utilities	280	54	0.111
D. Ohio Edison	385	500	1.411
E. Princeton Mu	1668		0.000
	4401	*375*	*12.112*

Note: There was a mistake on the volume from Ohio Edison that was corrected on the 2nd sheet (and presumably on the signed copy of the manifest). 4401 is the correct total, not

Summary of PPM, KS Loads

4236 as on the copy of the manifest.

A. Champlin Petroleum (now Citgo), Corpus Cristi, TX #766000 OK

			ppm	nameplate gal
TCs:	51	825@1242	825	205
	52	1015@1242	1015	205

B. Kimberly Clark (now Sweitzer Manduit), Lee, MA #49760 OK

			ppm	nameplate gal
TCs:	30	341@1242 392@1260	733	730
	34	14@1242 204@1260	218	60
	35	9@1242 230@1260	239	60
	36	8@1242 248@1260	256	60
	6	645@1254	645	561

C. Municipal Utilities, Rochelle, IL #51450 OK

Per job folder.

			ppm	nameplate gal
TCs:	9001	7@1242 47@1260	54	186

D. This was an MR disposal job, actual concentrations not available from information that we reviewed. It was a maximum, however, of <500 ppm, so we use 500 in the summary.

E. Princeton Muni., Princeton, IL #29930 OK

			ppm	nameplate gal
TCs:	1	214@1242	214	734
	3	449@1260	449	400
	9	483@1260	483	338

LOAD 10 2/6/87 DATE SHIPPED MANIFEST: 87-010

Customer	Volume	AVERAGE ppm PCBs	lb. PCBs
A. C. of Houston	610	500	2.236
B. Cin. Milacron	440	122	0.392
C. Windsor Pl.	420	500	1.539
D. Pipe Stone	2200	96	1.548
E. Georgetown S	270	102	0.202
F. Cloverland	715	340	1.782
G. SDMI	550	500	2.016
	5205	*255*	*9.715*

Summary of PPM, KS Loads

A. City of Houston, Houston, TX #55070 — no job folder

			ppm	nameplate gal
TCs:	9001	500@1242	500	610

B. Cincinnatti Milacron, Cincinnatti, OH #850000 — OK

			ppm	nameplate gal
TCs:	35	198@1242 5@1260	203	190
	53	48@1242 5@1260	53	225

C. Windsor Place, no info. This was apparently a disposal job, so 500 ppm is appropriate.

D. Pipe Stone, Percy, IL #171000 — OK

			ppm	nameplate gal
TCs:	14	79@1242 20@1260	96	2200

E. Georgetown Steel, Georgetown, SC #39530 — OK

			ppm	nameplate gal
TCs:	7002	63@1242 39@1260	102	610

F. Cloverland Electric, Drafter, MI #893000 — OK

			ppm	nameplate gal
TCs:	105	340@1242	340	715

SDMI load was MR liquids. <500 ppm.

LOAD 11 — 2/10/87 DATE SHIPPED — MANIFEST: 87-011

Customer	Volume	AVERAGE ppm PCBs	lb. PCBs
A. Bureau of R	1040	815	6.213
B. Great Salt L Ch	95	493	0.343
C. ADM-C.R.	985	54	0.390
D. Manti	1929	553	7.819
	4049	*497*	*14.765*

This load was sent by SDMI to National Electric for disposal. National Electric sent it to PPM.

A. Bureau of Reclamation, Montrose. CO #49290

Two transformers, same size, one 1425 ppm 1242 the other 205 ppm 1242 (TC1&2).

Summary of PPM, KS Loads

B. Great Salt Lake Mining and Chemical, Ogden, UT #1805000
TC7003, 493 ppm PCB,

C. ADM Corn Sweeteners, Cedar Rapids, #29000
TC2 - 54 ppm @1242

D. Manti Light and Power, Manti, UT
TC5 - 553 ppm PCBs #2482000

Total Gallons: 48457 ***607 Avg. ppm*** ***lbs. PCB: 215.618***

215.618 pounds of PCB is roughly equivalent to 360 lbs. Askarel - less than 29 gallons. This is less than the amount that would be left in one 300 gallon transformer after being drained and flushed, since that process removes about 90% of the liquid from a transformer.